The Governing Board recognizes the district's responsibility to maintain fiscal integrity and transparency in the use of all funds awarded through federal grants. The district shall comply with all requirements detailed in any grant agreement with an awarding agency and with the federal Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards specified in 2 CFR 200.0-200.521 and any stricter state laws and district policy.

Any goods or services purchased with federal funds shall be reasonable in cost and necessary for the proper and efficient performance or administration of the program.

The Superintendent or designee shall ensure that the district's financial management systems and procedures provide for the following: (2 CFR 200.302)

- 1. Identification in district accounts of each federal award received and expended and the federal program under which it was received
- 2. Accurate, current, and complete disclosure of the financial results of each federal award or program in accordance with the reporting requirements of 2 CFR 200.328 and 200.329
- 3. Records and supporting documentation that adequately identify the source and application of funds for federally funded activities, including information pertaining to federal awards, authorizations, financial obligations, unobligated balances, assets, expenditures, income, and interest
- 4. Effective control over and accountability for all funds, property, and other assets and assurance that all assets are used solely for authorized purposes
- 5. Comparison of actual expenditures with budgeted amounts for each federal award

- 6. Written procedures to implement provisions governing payments as specified in 2 CFR 200.305
- 7. Written procedures for determining the allowability of costs in accordance with 2 CFR 200.400-200.475 and the terms and conditions of the federal grant award

The Superintendent or designee shall develop and implement appropriate internal control processes to reasonably assure that transactions are properly executed, recorded, and accounted for so that the district can prepare reliable financial statements and federal reports, maintain accountability over assets, and demonstrate compliance with federal laws, regulations, and conditions of the federal award. (2 CFR 200.61, 200.62, 200.303)

Equipment purchased with federal funds shall be properly inventoried and adequately maintained to safeguard against loss, damage, or theft of the property.

All staff involved in the administration or implementation of programs and activities supported by federal funds shall receive information and training on the allowable use of federal funds, purchasing procedures, and reporting processes commensurate with their duties.

The district shall submit financial and performance reports to the awarding agency in accordance with the schedule and indicators required for that federal grant by law and the awarding agency. As required, such reports may include a comparison of actual accomplishments to the objectives of the federal award, the relationship between financial data and performance accomplishments, the reasons that established goals were not met if applicable, cost information to demonstrate cost-effective practices, analysis and explanation of any cost overruns or high unit costs, and other relevant information. The final performance report shall be submitted no later than 120 calendar days after the ending date of the grant. (2 CFR 200.301, 200.328, 200.329)

## **FEDERAL GRANT FUNDS**

## Policy Reference Disclaimer:

These references are not intended to be part of the policy itself, nor do they indicate the basis or authority for the board to enact this policy. Instead, they are provided as additional resources for those interested in the subject matter of the policy.

State	Description
Ed. Code 42122-42129	Budget requirements
Ed. Code 64001	School plan for student achievement, consolidated application programs
Federal	Description
2 CFR 180.220	Amount of contract subject to suspension and debarment rules
2 CFR 200.0-200.521	Federal uniform grant guidance
2 CFR 200.1-200.99	<u>Definitions</u>
2 CFR 200.100-200.113	General provisions
2 CFR 200.317-200.326	<u>Procurement standards</u>
2 CFR 200.327-200.329	Monitoring and reporting
2 CFR 200.333-200.337	Record retention
2 CFR 200.400-200.475	Cost principles
2 CFR 200.500-200.521	Audit requirements
34 CFR 76.730-76.731	Records related to federal grant programs
48 CFR 2.101	Federal acquisition regulation; definitions
Management Resources	Description
California Department of Education Publication	01-05 Guidelines for Piloting Textbooks and Instructional Materials, rev. January 2015
Education Audit Appeals Panel Publication	Guide for Annual Audits of K-12 Local Education Agencies and State Compliance Reporting

## FEDERAL GRANT FUNDS

Management Resources	Description
U.S. Department of Education Publication	21st Century Community Learning Centers, Nonregulatory Guidance, February 2003
	AASA The School Superintendents
Website	<u>Association</u>
Cross References	
<b>Policy</b> 0500	<b>Description</b> Accountability
	Accountability  A The District Part 1
1340	Access To District Records
1340	Access To District Records
3100	<u>Budget</u>
3100	<u>Budget</u>
3231	Impact Aid
3270	Sale And Disposal Of Books, Equipment And Supplies
3270	Sale And Disposal Of Books, Equipment And Supplies
3300	Expenditures And Purchases
3311	<u>Bids</u>
3311	<u>Bids</u>
3311.4	Procurement Of Technological Equipment
3312	<u>Contracts</u>
3314	Payment For Goods And Services
3314	Payment For Goods And Services
3350	<u>Travel Expenses</u>
3400	Management Of District Assets/Accounts
3400	Management Of District Assets/Accounts
3440	<u>Inventories</u>

## **FEDERAL GRANT FUNDS**

Policy	Description
3460	Financial Reports And Accountability
3460	Financial Reports And Accountability
3512	<u>Equipment</u>
3512-E(1)	<u>Equipment</u>
3551	Food Service Operations/Cafeteria Fund
3551	Food Service Operations/Cafeteria Fund
3580	<u>District Records</u>
3580	<u>District Records</u>
4131	Staff Development
4231	Staff Development
4331	Staff Development
6173.4	Title VI Indian Education Program
6178	Career Technical Education
6178	Career Technical Education
6190	Evaluation Of The Instructional Program
9270	Conflict Of Interest
9270-E(1)	Conflict Of Interest

PASADENA UNIFIED SCHOOL DISTRICT **Policy** Pasadena, California

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